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*Counsel for Representative Plaintiffs  
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*[Additional counsel on signature page]*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ELLEN PACE,

Plaintiffs,

v.

OMNI FAMILY HEALTH,

Defendant.

Case No. 1:24-cv-01277-JLT-CDB

**NOTICE OF SETTLEMENT**

1 Plaintiffs and Defendant Omni Family Health (“Omni” or “Defendant” and, together, the  
2 “Parties”) in the above-captioned consolidated action (the “Consolidated Action”) hereby jointly  
3 provide this Notice of Settlement through their undersigned counsel.

4 The Parties have reached an agreement-in-principle that resolves all of the claims alleged  
5 in the Class Action Complaints filed in the Consolidated Action. The Parties shall document the  
6 proposed settlement in a Settlement Agreement and ancillary documents, and Plaintiffs will  
7 thereafter move for preliminary approval of a settlement class pursuant to Fed. R. Civ. P. 23 (e).  
8 Plaintiffs respectfully request that the Court set the deadline to file the motion for preliminary  
9 approval for June 9, 2025, forty-five (45) days from the date of this Notice.

10 The Parties respectfully request that the Court confirm that the case deadlines set forth in  
11 this matter are stayed. The Parties believe that a stay of the proceedings is in the interest of justice  
12 and will preserve party and judicial resources.

13  
14 DATED: April 23, 2025

**GIRARD SHARP LLP**

/s/ Adam E. Polk

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*Counsel for Representative Plaintiffs  
and the Proposed Plaintiff Class*

1 DATED: April 23, 2025

**TROUTMAN PEPPER LOCKE LLP**

2 /s/ Ronald I. Raether, Jr. (as authorized on  
3 April 23, 2025)

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23 *Attorneys for Defendant,*  
24 *Omni Family Health*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Adam E. Polk  
Adam E. Polk